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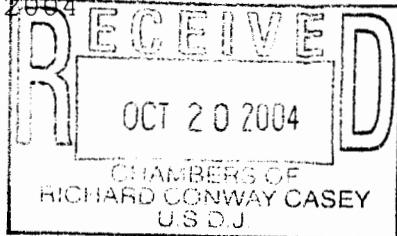
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October 19, 2004



VIA OVERNIGHT MAIL

The Honorable Richard Conway Casey
United States District Court for the
Southern District of New York
United States Courthouse
500 Pearl Street, Room 1950
New York, New York 10007

Re: *In re Terrorist Attacks of September 11, 2001, 03 MDL 1570 (RCC)*: Application for Extension of Time to Effectuate Service

Dear Judge Casey:

I write in response to today's letter from Jerry S. Goldman regarding the *O'Neill* plaintiffs' request for a 120-day extension of time to effectuate service.

I would like to clarify two points. First, the *O'Neill* plaintiffs do not dispute that their letter request was filed in direct violation of this Court's June 17, 2004, Order relating to all actions filed in 03 MDL 1570. There is no provision in the procedures established by this Court for an *ex parte* application for extension, nor is there any suggestion that parties who have already appeared in one action lack standing to object to an extension for service in another action.

Second, on behalf of the Kingdom of Saudi Arabia, we have agreed to several proposals by the *O'Neill* plaintiffs concerning the methodology of service and, as long as the plaintiffs complied with certain specified procedures, we have agreed that we would not challenge the means of service. But we have never agreed to any extension of the time for service. Case

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Management Order # 2 clearly established a deadline of October 15, 2004, for service on all defendants named before June 16, 2004, in the MDL cases consolidated before this Court. The O'Neill plaintiffs filed their complaints well before June 16, 2004. The deadline for service has accordingly passed and we have not, and will not, voluntarily consent to any extension of that deadline.

Respectfully Submitted,

Michael K. Kellogg / PSM

Michael K. Kellogg

The Court has reviewed Mr. Goldman's letters of October 14 & October 19.

Mr. Goldman's request for an extension to serve certain defendants = EXCEPT Mr. Kellogg's clients = is granted with respect to Mr. Kellogg's clients, the parties are urged to work this service assignment among themselves.

11/5/04

Michael K. Kellogg / PSM